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6 Attorneys for Bankruptcy Claimants,
STEPHEN PUTNAM HERRIN, individually and
as Trustee of the DONALD E. RYCKMAN and
7 ROSEMARY H. RYCKMAN REVOCABLE
TRUST DATED FEBRUARY 25, 1999
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12 Counsel for Robins Cloud LLP

13 UNITED STATES BANKRUPTCY COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION
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17 In re
18 PG&E CORPORATION and PACIFIC GAS AND
ELECTRIC COMPANY
19 Debtors
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Case No. 19-30088 (DM)

Chapter 11

NOTICE OF ERRATA RE: NOTICE OF
MOTION FOR ORDER AUTHORIZING
WITHDRAWAL OF COUNSEL

[NOTICE OF MOTION AND MOTION
FILED ON JUNE 26, 2020 AS DK. NO.
8139]

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1 TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY COURT
2 JUDGE, AND ALL INTERESTED PARTIES:

3 PLEASE TAKE NOTICE that the *Notice of Motion* (“Notice of Motion”) and *Motion for Order*
4 *Authorizing Withdrawal of Counsel; Memorandum of Points and Authorities*, filed on June 26, 2020, as
5 Dk. No. 8139, by counsel for the Firm of ROBINS CLOUD LLP, current attorneys of record for
6 Judgment Creditor, Stephen Putnam Herrin, individually and as Trustee of the Donald E. Ryckman and
7 Rosemary H. Ryckman Revocable Trust Dated February 25, 1999, inadvertently contained incorrect
8 language, and did not contain all necessary language. To avoid confusion, the language of the Notice of
9 Motion shall be replaced with the following:

10 “NOTICE IS GIVEN that the Firm of ROBINS CLOUD LLP, current attorneys of record for
11 Judgment Creditor, Stephen Putnam Herrin, individually and as Trustee of the Donald E. Ryckman and
12 Rosemary H. Ryckman Revocable Trust Dated February 25, 1999, will and hereby does move this Court
13 for an Order Authorizing Withdrawal of Counsel in the Bankruptcy case referenced above. This Motion
14 is pursuant to the applicable Rules of Procedure and is based upon this notice, the motion itself, the
15 accompanying memorandum of points and authorities, the declaration of Rex Grady, and the pleadings
16 and documents on file in this case.

17 PLEASE TAKE FURTHER NOTICE that pursuant to Bankruptcy Local Rule 9014-1(3)(A) any
18 objection to the requested relief, or a request for hearing on the matter, must be filed and served upon the
19 initiating party within 21 days of mailing the notice;

20 Any objection or request for a hearing must be accompanied by any declarations or memoranda
21 of law any requesting party wishes to present in support of its position;

22 If there is no timely objection to the requested relief or a request for hearing, the court may enter
23 an order granting the relief by default.

24 In the event of a timely objection or request for hearing, (either):

25 The initiating party will give at least seven days written notice of the hearing to the objecting or
26 requesting party, and to any trustee or committee appointed in the case; or

27 The tentative hearing date, location and time are (insert date location and time).”
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1 DATED: 14 July 2020

ROBINS CLOUD LLP

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7 REX GRADY, Esq.

8 Attorneys for Judgment Creditor,
9 STEPHEN PUTNAM HERRIN, individually and
10 as Trustee of the Donald R. Ryckman and
11 Rosemary H. Ryckman Revocable Trust Dated
12 February 25, 1999

13 GRIMSHAW LAW GROUP, P.C.

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18 MATTHEW W. GRIMSHAW, Esq.

19 Counsel for Robins Cloud LLP
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